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*Attorneys for Plaintiff
Johnson & Johnson Health Care Systems Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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|----------------------------|---|--|
| JOHNSON & JOHNSON | : | |
| HEALTH CARE SYSTEMS INC., | : | Civil Action No. 22-2632(JKS)(CLW) |
| | : | |
| Plaintiff, | : | Hon. Jamel K. Semper, U.S.D.J. |
| | : | Hon. Cathy L. Waldor, U.S.M.J. |
| v. | : | Hon. Freda L. Wolfson, Special Master |
| | : | |
| SAVE ON SP, LLC, EXPRESS | : | <u>NOTICE OF MOTION TO SEAL</u> |
| SCRIPTS, INC., AND ACCREDO | : | |
| HEALTH GROUP, INC., | : | |
| | : | |
| Defendants. | : | |

COUNSEL:

PLEASE TAKE NOTICE that on April 7, 2025 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Johnson

& Johnson Health Care Systems Inc. (“JJHCS”) will apply before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order:

- (a) Permanently maintaining under seal the letters and supporting exhibits filed by the parties in connection with the Motion of Defendant Save On SP, LLC (“SaveOnSP”) to Compel JJHCS to Add TrialCard Custodians and Run Additional Searches, dated January 3, 2025, with related briefing dated January 24 and February 10, 2025 (ECF Nos. 489, 500 & 533), filed on January 7, January 27, and February 25, 2025 (the “TrialCard Motion”); and
- (b) Permitting JJHCS to file the proposed public versions of ECF Nos. 489, 500 & 533, attached as Exhibits A, B, and C to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and the index in support of this motion. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to L. Civ. R. 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

PLEASE TAKE FURTHER NOTICE that SaveOnSP does not object to the relief requested.

Respectfully submitted,

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Dated: March 11, 2025